

JAMES P. KEMP, ESQUIRE  
Nevada Bar No. 006375  
KEMP & KEMP, ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110,  
Las Vegas, NV 89130  
(702) 258-1183 tel./ (702) 258-6983 fax  
[jp@kemp-attorneys.com](mailto:jp@kemp-attorneys.com)  
Attorney for Plaintiff JACQUELYNN NICKLER

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JACQUELYNN NICKLER,	)	Case No. 2:14-cv-01907-JCM-DJA
	)	
Plaintiff,	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>EXTEND TIME FOR PLAINTIFF</b>
vs.	)	<b>TO RESPOND TO</b>
	)	<b>DEFENDANTS' MOTIONS TO</b>
COUNTY OF CLARK, organized and of the	)	<b>DISMISS AND FOR SUMMARY</b>
existing under the laws of State of Nevada;	)	<b>JUDGMENT</b>
STEVEN D. GRIERSON, court administrator,	)	<b>(FIRST REQUEST)</b>
individually; KATHLEEN LAMBERMONT,	)	
administrator of the Clark County District	)	
Attorney's office, individually; and, DOE 1	)	
through 10, inclusive;	)	
	)	
Defendants.	)	

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendants' Motion to Dismiss (ECF No. 96) or for Summary Judgment (ECF No. 97) from the current due dates of Friday, October 4 and Friday, October 11, 2019 through and including **Friday, October 25, 2019.**

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

1. Plaintiff's counsel was on vacation at the time that the Motion for Summary Judgment was filed on September 16, 2019 and his first day back in the office

**KEMP & KEMP**  
ATTORNEYS AT LAW  
7435 W. Azure Drive, Suite 110  
LAS VEGAS, NEVADA 89130  
Tel. (702) 258-1183 ♦ Fax (702) 258-6983

1 after vacation was September 26, 2019 and, thus, he has not had the benefit of  
2 the full response period to address the Motion to Dismiss or Alternatively for  
3 Summary Judgement. Further Plaintiff's counsel will be out of state for the  
4 Nevada Justice Association annual CLE convention from October 3 through  
5 October 6, 2019 further limiting the time to respond to the motions;  
6

7 2. Additionally, Plaintiff's counsel is facing a very heavy workload with two  
8 other Summary Judgment Oppositions (in addition to the one in this case) due  
9 between now and November 1, 2019, an Opening Brief due in Judicial Review  
10 of a workers' compensation decision in state district court due on October 26,  
11 2019, a Reply Brief due in another Judicial Review case due on October 18,  
12 2019, and a Reply Brief due on a Ninth Circuit appeal that has been extended  
13 to November 4, 2019. These are all significant matters most of which  
14 requiring appellate level briefing;  
15

16 3. Additionally, Plaintiff's counsel is due to have knee surgery on October 18,  
17 2019 and will be unable to work for at least a couple of days post surgery.  
18

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27  
28

This stipulation to extend the deadline is made in good faith and not for purposes of delay.

Dated: October 1, 2019

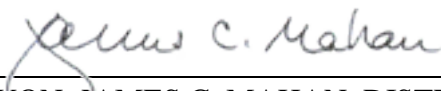
Dated: October 1, 2019

/s/ James P. Kemp  
James P. Kemp, Esq.  
KEMP & KEMP ATTORNEYS AT LAW  
7435 West Azure Drive, Suite 110  
Las Vegas, NV 89130  
(702) 258-1183 / 258-6983 fax  
Attorney for Plaintiffs

/s/ Robert W. Freedman, Jr.  
Robert W. Freedman, Jr., Esq.  
LEWIS BRISBOIS BISGAARD & SMITH  
6385 S. Rainbow Blvd., Ste. 600  
Las Vegas, NV 89118  
(702) 893-3383 / (702) 893-3789 fax  
[Robert.freeman@lewisbrisbois.com](mailto:Robert.freeman@lewisbrisbois.com)  
Attorneys for Defendants Clark County and  
Kathleen Lambermont

/s/ D. Randall Gilmer  
D. Randall Gilmer, Esq.  
OFFICE OF ATTORNEY GENERAL  
555 E. Washington Avenue, Suite 2600  
Las Vegas, NV 89101  
(702) 486-3427 / (702) 486-3774 fax  
[drgilmer@ag.nv.gov](mailto:drgilmer@ag.nv.gov)  
Attorney for Steven D. Grierson

IT IS SO ORDERED:

  
HON. JAMES C. MAHAN, DISTRICT JUDGE

Dated: October 3, 2019